

L. LIN WOOD, P.C.
 L. Lin Wood (admitted *pro hac vice*)
 lwood@linwoodlaw.com
 Nicole J. Wade (admitted *pro hac vice*)
 nwade@linwoodlaw.com
 Jonathan D. Grunberg (admitted *pro hac vice*)
 jgrunberg@linwoodlaw.com
 G. Taylor Wilson (admitted *pro hac vice*)
 twilson@linwoodlaw.com
 1180 West Peachtree Street, Ste. 2040
 Atlanta, Georgia 30309
 404-891-1402
 404-506-9111 (fax)

CHATHAM LAW GROUP
 Robert Christopher Chatham
chris@chathamfirm.com
 CA State Bar No. 240972
 3109 W. Temple St.
 Los Angeles, CA 90026
 213-277-1800

WEISBART SPRINGER HAYES, LLP
 Matt C. Wood (admitted *pro hac vice*)
 mwood@wshlpp.com
 212 Lavaca Street, Ste. 200
 Austin, TX 78701
 512-652-5780
 512-682-2074 (fax)

Attorneys for Plaintiff Vernon Unsworth

QUINN EMANUEL URQUHART
 & SULLIVAN, LLP
 Alex B. Spiro (admitted *pro hac vice*)
 alexspiro@quinnemanuel.com
 51 Madison Avenue, 22nd Floor
 New York, New York 10010
 Telephone: (212) 849-7000

QUINN EMANUEL URQUHART
 & SULLIVAN, LLP
 Robert M. Schwartz (Bar No. 117166)
 robertschwartz@quinnemanuel.com
 Michael T. Lifrak (Bar No. 210846)
 michael lifrak@quinnemanuel.com
 Jeanine M. Zalduendo (Bar No. 243374)
 jeaninezalduendo@quinnemanuel.com
 865 South Figueroa Street, 10th Floor
 Los Angeles, California 90017-2543

Attorneys for Defendant Elon Musk

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

VERNON UNSWORTH,

 Plaintiff

 v.

 ELON MUSK,

 Defendant.

Case No. 2:18-cv-08048-SVW (JC)

Judge: Hon. Stephen V. Wilson

**JOINT STIPULATION TO REQUEST
 AMENDMENTS TO SCHEDULING
 ORDER**

Complaint Filed: Sept. 17, 2018
 Trial Date: Dec. 3, 2019

1 Plaintiff Vernon Unsworth and Defendant Elon Musk (collectively, the “Parties”) by and
2 through their counsel of record, hereby stipulate pursuant to Central District of California Local
3 Rules (“L.R.”) 7-1 to request that the Court amend the Scheduling Order (Doc. 54)¹ to permit at
4 least six depositions to be taken after the close of discovery on September 13, 2019 and to permit
5 Plaintiff to take in excess of ten (10) depositions, as follows:

6 1. WHEREAS, on June 17, 2019, the parties filed their Proposed Discovery Plan,
7 which provided that fact discovery would close on Friday, September 13, 2019;

8 2. WHEREAS, the Parties have acted diligently in undertaking discovery, having
9 exchanged written discovery and taken a total of seven (7) depositions to date;

10 3. WHEREAS, this is the first request by the Parties to amend deadlines in the
11 Scheduling Order;

12 4. WHEREAS, the amendments requested in this Joint Stipulation will not delay the
13 currently scheduled trial date of December 3, 2019 or any other scheduled date or deadline;

14 5. WHEREAS, both Parties agree to the amendment of the Scheduling Order as set
15 forth herein;

16 NOW THEREFORE, the Parties agree and stipulate to the following:

17 1. The deposition of third-party witness Ryan Mac, who published certain statements
18 at issue in this litigation, will take place after the close of discovery, as soon as can
19 be arranged after resolution of his motion to quash the subpoenas served on him by
20 both parties;

21 2. Defendant will make available for deposition Steve Davis, an employee of a
22 Defendant-related entity whose deposition was initially noticed for September 9,
23 after the close of discovery as soon as can be arranged in light of the ongoing
24 medical condition that rendered him unable to attend his scheduled deposition;
25

26 ¹ The Parties are treating the Proposed Discovery Plan that was attached as Exhibit A to the
27 Joint Rule 26(F) Report and Proposed Discovery Plan submitted on June 17, 2019, (Doc. 54), as
28 the “Scheduling Order.” The Parties are not aware that the Court has actually issued a Scheduling
Order based on that proposed plan but are proceeding on the assumption that the Proposed
Discovery Plan is the currently operative Scheduling Order in this matter.

- 1 3. Defendant will make available for deposition third-party witness Sam Teller, who
2 until very recently was employed by Defendant-related entities and who was
3 identified in Defendant's Supplementary Interrogatory Responses served on August
4 21, after the close of discovery on a date to be agreed upon by counsel not later
5 than October 11, 2019;
- 6 6. Plaintiff will subpoena for deposition third-party witness David Arnold, a former
7 employee of a Defendant-related entity, who was identified as the result of the
8 document production by third-party Tesla in response to a subpoena on September
9 11, after the close of discovery not later than October 11, 2019;
- 10 7. Plaintiff will subpoena for deposition third-party witness Juleanna Glover with
11 Ridgely Walsh, LLP, who was identified as a result of the document production by
12 third-party Tesla in response to a subpoena on September 11, after the close of
13 discovery not later than October 11, 2019;
- 14 8. Plaintiff shall be permitted to take in excess of the statutory limit of ten (10)
15 depositions solely to complete the depositions set forth herein;
- 16 9. The Parties have agreed that they will not seek any other depositions except those
17 set forth herein absent exceptional circumstances;

18
19 The Parties have submitted herewith a proposed Order for the Court's consideration to
20 effectuate the agreed-upon requested amendments to the Scheduling Order.

1 DATED: September 16, 2019

Respectfully submitted,
L. LIN WOOD, P.C.

4 By /s/ Lin Wood

5 L. LIN WOOD, P.C.
6 L. Lin Wood (admitted *pro hac vice*)
lwood@linwoodlaw.com
7 Nicole J. Wade (admitted *pro hac vice*)
nwade@linwoodlaw.com
8 Jonathan D. Grunberg (admitted *pro hac vice*)
jgrunberg@linwoodlaw.com
9 G. Taylor Wilson (admitted *pro hac vice*)
twilson@linwoodlaw.com
10 1180 West Peachtree Street, Ste. 2040
11 Atlanta, Georgia 30309
404-891-1402
404-506-9111 (fax)

12 -and-

13
14 CHATHAM LAW GROUP
15 Robert Christopher Chatham
chris@chathamfirm.com
16 CA State Bar No. 240972
3109 W. Temple St.
17 Los Angeles, CA 90026
213-277-1800

18 -and-

19
20 WEISBART SPRINGER HAYES, LLP
Matt C. Wood (admitted *pro hac vice*)
21 mwood@wshlpp.com
22 212 Lavaca Street, Ste. 200
Austin, TX 78701
512-652-5780
23 512-682-2074 (fax)

24 *Attorneys for Plaintiff Vernon Unsworth*
25
26
27
28

1 DATED: September 16, 2019

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

2
3
4 By /s/ Michael T. Lifrak

Michael T. Lifrak (Bar No. 210846)
michaellifrak@quinnemanuel.com
Robert M. Schwartz (Bar No. 117166)
robertschwartz@quinnemanuel.com
Jeanine M. Zalduendo (Bar No. 243374)
jeaninezalduendo@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
Telephone: (213) 443-3000

10 Alex B. Spiro (admitted pro hac vice)
11 alexspiro@quinnemanuel.com
12 51 Madison Avenue, 22nd Floor
13 New York, New York 10010
Telephone: (212) 849-7000

14 *Attorneys for Defendant Elon Musk*

15
16 Pursuant to L.R. 5-4.3.4(a)(2)(i), the filer
17 hereby attests that all signatories listed, and on
18 whose behalf this filing is submitted, concur in
the filing's content and have authorized the
filing.

19 /s/Nicole Jennings Wade
20
21
22
23
24
25
26
27
28